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VIA E-MAIL AND ECF

Honorable Jesse M. Furman
United States District Judge
40 Foley Square
New York, NY 10007

Re: *Argudo, et al. v. Parea Group Ltd. et al*, 18-cv-0678 (JMF)

Dear Judge Furman:

As noted in letter to Your Honor dated January 14, 2021 (ECF No. 251), this firm now represents Defendants Pasta Perfect, LLC and IM 60th Street, LLC (the “Acquired Parties”), as well as Benefit Street Partners (“BSP”)¹ which is the secured lender to various companies that are Debtors² in chapter 11 bankruptcy cases pending in the U.S. Bankruptcy Court for the Southern District of New York (Case No. 20-11723 (MG)) (the “Bankruptcy Case”). In our prior letter, in footnote 12, we noted that that:

Whether any equity or management rights of defendant Wonderful Restaurant, LLC were acquired as part of the Sale remains unclear. BSP is currently investigating this issue.

Since our letter, BSP has reached out to parties known to the Acquired Parties and BSP who might know whether any equity or management rights of defendant Wonderful Restaurant, LLC were acquired as part of the Sale (as defined in our prior letter). Although we were able to confirm that IM 60th Street owns all of the equity interests in Wonderful Restaurant, we have been unable to confirm who manages Wonderful Restaurant. However, it appears that the interested stakeholders believe that K.G. IM, LLC formerly managed Wonderful Restaurant and if that is the case such management rights were transferred in connection with the Sale. Accordingly, unless any party objects, on the basis of our understanding of the facts as outlined, this firm will enter its appearance

¹ Specifically, BSP Agency LLC, Providence Debt Fund III, L.P., Benefit Street Partners SMA LM L.P., Providence Debt Fund III LP, BSP IM Investments Master LP., and Benefit Street Partners SMA-C L.P.

² The Debtors are K.G. IM, LLC; Il Mulino USA, LLC; IM LLC – III; IMNYLV, LLC; IM NY, Florida, LLC; IM NY, Puerto Rico, LLC; IMNY AC, LLC; IM Products, LLC; IM Long Island Restaurant Group, LLC; IM Long Island, LLC; IM Franchise, LLC; IM 60th Street Holdings, LLC; IM Broadway, LLC; IMNY Hamptons, LLC; and IM Payroll, LLC. *In re K.G. IM, LLC, et al.*, No. 20-11723 (MG) (Bankr. S.D.N.Y.).

on behalf of Wonderful Restaurant and Wonderful Restaurant will consent to the *Motion to Withdraw as Counsel* filed by the EGS firm, while reserving all other rights as to her and her firm.

Respectfully submitted,

/s/ Jordan D. Weiss

Jordan D. Weiss

Counsel to Pasta Perfect, LLC, IM 60th Street, LLC and Wonderful Restaurant

CC: All counsel of record (via ECF)
Chester Ostrowski, counsel for Steven Raia, owner of a 30% membership interest in IM 60th Street, LLC (via email)
Marc Rosenberg, counsel for Mr. Raia (via email)